1. An update of your environmental commitment/policy. Has it changed, been updated and why?

Conway Widget Manufacturing (CWM)'s Management Environmental Commitment is attached. The content of this commitment has not changed. The site manager at Conway's Widget Facility has changed. This document has been revised with the current site manager's name, Jeff Blair, who strongly endorses this environmental commitment.

2. Documentation of your environmental regulatory compliance record for the past three years. List any exceedances, NOV's, fines, etc. If regulatory problems occurred during the past three years describe the actions taken to avoid reoccurrence and the actions required by the regulatory agency.

March 2005 – Wastewater sample testing showed an exceedance in zinc concentration against the facility's wastewater permit issued by Conway Sanitary Sewer District. CWM self reported this exceedance to Conway Sanitary Sewer District. No fines were assessed. Conway Widget Manufacturing maintains an extremely clean production area. Cleaning personnel regularly mop production areas. Investigation into this incident found that cleaning water was being poured into sanitary drains rather than process water drains, bypassing the facility's process pond. The process pond provides settling and the removal of suspended fluids (oil), before discharging to the sewer. Procedures and training were provided to insure cleaning water is poured into process water drains. CWM has not had a wastewater exceedance since this incident.

3. A brief description of any existing site contamination and actions taken to ensure its containment. Describe the required minimum actions to remediate.

NONE

4. A list of environmental programs initiated by your company/facility in the past three years.

Conway Widget Manufacturing gained membership into EPA's National Performance Track in 2003, voluntarily committing to four environmental objectives. These objectives are: 1) reducing non-transportation energy use, 2) reducing the total waste sent to landfill, 3) reducing water use, and 4) land and habitat conservation. Conway Widget Manufacturing has met program commitments in all four areas and this is reported annually into the program.

In an effort to reduce cost and waste, in 2004, Conway Widget Manufacturing successfully secured a vendor for reprocessing hydraulic oil. The vendor reprocesses approximately 1600 gallons of hydraulic oil per month from the facility. The oil is pumped from the hydraulic oil system into a tanker truck, cleaned off-

site, tested for condition, enhanced with any needed additives, and returned to the facility's hydraulic system.

In 2006, CWM found a recycling vendor for waste industrial plastic, which includes broken plastic pallets, sheet and film plastic. Approximately 35 tons of plastic has been recycled thus far.

5. An update to the status of existing environmental programs. State any goals that you have met.

CWM remains ISO 14001 certified. Copy of Certification provided.

CWM continues to utilize recycling outlets for the following major waste streams: 1) cardboard and paper, 2) aluminum cans and 3) metal waste.

6. Documentation of trends in your company/facility's key environmental performance indicators (e.g. water, air, waste, toxics, energy, etc), which validate continuous improvements, made over the past three years.

See attached graphs.

7. A brief description of all measurable goals for total wastes and/or emissions reductions your company/facility has set for the next two years and beyond, where applicable.

The following goals are included in Conway's Widget Manufacturing 2008 plans:

- Increase the production waste percentage, aiming for 100% production waste recycled by 2012.
- 4% reductions in water use and total energy consumption.
- 8. A brief description of any community activities/issues your company/facility has been involved in during the past three years.

CW has been an active member in the adopt-a-highway program for several years.

2007 Targets and Objectives

Energy (GJ/Ton)

| | Actual | Objective |
|-----------|--------|-----------|
| January | 4.82 | 5.00 |
| February | 5.02 | 5.00 |
| March | 4.67 | 4.80 |
| April | 4.98 | 5.15 |
| May | 5.17 | 5.00 |
| June | 4.99 | 4.80 |
| July | 5.11 | 5.20 |
| August | 5.01 | 5.00 |
| September | 4.77 | 4.90 |
| October | 4.82 | 4.90 |
| November | 4.93 | 4.90 |
| December | 5.10 | 5.50 |

Landfill

| Target | Tons/month |
|-----------|------------|
| January | 60.0 |
| February | 59.2 |
| March | 65.4 |
| April | 72.4 |
| May | 80.2 |
| June | 64.8 |
| July | 56.5 |
| August | 62.9 |
| September | 55.5 |
| October | 66.7 |
| November | 51.3 |

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Waste to Landfill (metric tons)

